

September 14, 1984

Dear Heavy-Duty Engine Manufacturer:

CD-84-12 (HD)

Subject: Five Percent Exemption From More Stringent Heavy-Duty
Engine (HDE) Gasoline Emissions Standards

The enclosed letter was sent to the Ford Motor Company in response to their request for clarification of EPA's interpretation of 40 CFR 86.087-10(a)(3)(i). Because our response to Ford may be of general interest, we are providing all heavy-duty engine manufacturers with a copy of the letter.

If you have any questions regarding the letter, please contact Mr. J. Bozek at (313)668-4244.

Sincerely yours,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ANN ARBOR. MICHIGAN 48105

OFFICE OF
AIR. NOISE AND

RADIATION

August 31, 1984

Mr. Donald R. Buist, Director
Automotive Emissions and
Fuel Economy Office
Ford Motor Company
The American Road

Dearborn, MI 48121

Dear Mr. Buist:

This is in response to your recent request for a further clarification of the five percent allowance provision specified in 40 CFR 86.087-10(a)(3)(i).

The applicability of the new allowance was previously addressed on March 8, 1984 when Mr. J. W. Bozek responded to Mr. W. M. Kreucher's February 9, 1984 inquiry. At that time, Mr. Kreucher was advised that heavy-duty engines which are certified on the basis of compliance with the light-duty truck emission standards under the provisions of 40 CFR 86.082-1(b) are not eligible for the five percent allowance.

In response to your June 29, 1984 appeal, we have again reviewed the applicable regulations and preamble rationale, and have concluded that Ford's interpretation of the regulations is correct. As Ford has pointed out, the correct interpretation of S86.087-10(a)(3)(i) allows the sale of heavy-duty gasoline engines (HDGE's) in Class III applications (10,001-14,000 lbs. GVW) to be aggregated with the sales of HDGE's in Class IIB applications (8,500-10,000 lbs. GVW) prior to determining the total number of engines excluded from the more stringent catalysts EDGE standards by the five percent total sales rule. The class IIB sales volumes may be included in this calculation even though some or all of the applications are being optionally certified to the light-duty truck standards. AS a further clarification, engines from either class IIB or class III applications may be excluded.

It is also appropriate to reiterate that the purpose of this exemption is to allow certification in those limited situations where the manufacturer has determined that it is technically too difficult to certify to the more stringent standards which

typically would require catalyst control. In contrast, this exemption is not to be used as a cost savings option by certifying to the higher, non-catalyst standards designs which are technically capable of meeting the more stringent standard with the addition of catalyst control.

If you have any questions covering this interpretation, please contact John Bozek or myself.

Sincerely yours,

Andrew W. Kaupert, Chief
Certification Branch
Certification Division
Office of Mobile Sources